

1 QUINN EMANUEL URQUHART & SULLIVAN, LLP  
2 Shon Morgan (Bar No. 187736)  
3 shonmorgan@quinnemanuel.com  
4 Homin Ban (Bar No. 348320)  
5 hominban@quinnemanuel.com  
6 865 South Figueroa Street, 10<sup>th</sup> Floor  
7 Los Angeles, California 90017-2543  
8 Telephone: (213) 443-3000  
9 Facsimile: (213) 443-3100  
10 Cristina Henriquez (Bar No. 317445)  
11 cristinahenriquez@quinnemanuel.com  
12 555 Twin Dolphin Drive, 5<sup>th</sup> Floor  
13 Redwood Shores, California 94065  
14 Telephone: (650) 801-5000  
15 Facsimile: (650) 801 5100

16 *Attorneys for Defendants*

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UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

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14 *In re: Hyundai and Kia Engine  
15 Litigation II*

16 CASE No. 8:18-cv-02223-JLS-JDE

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**STATUS UPDATE REGARDING  
NOTICE TO CERTAIN CLASS  
MEMBERS**

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The Hon. Josephine L. Staton

1 Pursuant to the Court's order approving a modified notice to owners and lessees  
 2 of certain Kia class vehicles, Dkt. 154, and the further update to the Court submitted  
 3 by Defendants Kia America, Inc. and Kia Corporation (together, "Kia") proposing  
 4 revised deadlines to account for new notice date, Dkt. 155,<sup>1</sup> Kia provides the  
 5 following update:

6 **Notice to Affected Class Members.** On November 22, 2023, Epiq emailed  
 7 the summary notice to 3,636 class members. *See* Declaration of Amanda Sternberg  
 8 ("Sternberg Decl.") ¶ 6. Only 266 of these email notices were returned to Epiq as  
 9 undeliverable, representing a 93% success rate.

10 On November 22, 2023, Epiq mailed (via first class mail) 16,404 Class Notices  
 11 with a Court-approved cover notice to these affected class members. *Id.* ¶ 8. Of these  
 12 notices, 2,155 were returned as undeliverable, and Epiq then remailed 1,419 notice  
 13 packages after performing advanced address research. *Id.* ¶ 9. This represents a 95%  
 14 rate of successful notice via mail.

15 **Opt Outs and Objections.** The deadline for owners or lessees of this set of  
 16 class vehicles to opt out or object was December 26, 2023. Dkt. 154, 155. As of  
 17 January 4, 2024, Kia's settlement administrator has not received any opt out requests  
 18 or objections from affected class members. Sternberg Decl. ¶ 12.

19 **Claims Received.** As of January 4, 2024, Epiq has received 419 claims, of  
 20 which 397 have been assessed as fraudulent bot filings and 22 determined to be  
 21 legitimate submissions by affected class members. *Id.* ¶ 10. Epiq is reviewing these  
 22 claims as part of its normal claims review process. *Id.* ¶ 11. These claims are also  
 23 included as part of the regular claims reporting to Class Counsel. *Id.*

24 **KSDS Installation Rates.** For these affected class members, the deadline to  
 25 install the knock sensor detection software update to be eligible for certain claims  
 26 under the settlement is April 20, 2024. Dkt. 144, 145. Approximately 590,802 class  
 27

28 <sup>1</sup> The Court has not yet entered an order approving of the modified schedule,

1 vehicles, or approximately 63.4%, have KSDS installed as of January 4, 2024.  
2 Sternberg Decl. ¶ 13.

3 Given that no affected class members have requested exclusion or objected to  
4 the settlement, Kia proposes that no further hearing is necessary.

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6 DATED: January 8, 2024

7 QUINN EMANUEL URQUHART &  
8 SULLIVAN, LLP

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10 By: /s/ Shon Morgan

11 Shon Morgan

12 *Attorney for Hyundai Motor Company,  
13 Hyundai Motor America, Kia America,  
14 Inc., and Kia Corporation*

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